

UNITED STATES DISTRICT COURT
for the
Northern District of New York

UNITED STATES OF AMERICA)
v.)
) Case No. 5:25-MJ-125 (MJK)
)
)
JERRY P. GORDON,)
)
)
Defendant.)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of 4/24/25 in the county of Cayuga in the Northern District of New York the defendant violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------|---|
| 18 U.S.C. § 875(c) | Making a threat using interstate communications |

This criminal complaint is based on these facts:
See attached affidavit

Continued on the attached sheet.



Complainant's signature
John J. Honan, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 4/25/25

Judge's signature

City and State: Syracuse, New York

Hon. Mitchell J. Katz, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

United States

v.

Jerry P. Gordon,

Defendant.

Case No. 5:25-MJ-125 (MJK)
Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, John J Honan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging Jerry P. Gordon (“GORDON”) with violating Title 18, United States Code, Section 875(c), making a threat using interstate communications.

2. I am a Special Agent with the Federal Bureau of Investigation and have been since July 2022. I have been involved in numerous investigations involving narcotics trafficking, firearms trafficking, and other violent crimes. I also have worked on investigations that have involved locating individuals using electronic devices, such as cellular telephones, and collecting digital forensic evidence.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers. This affidavit is intended to show merely that there is probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that GORDON violated Title 18, United States Code, Section 875(c), making a threat using interstate communications.

PROBABLE CAUSE

5. In December 2024, the Federal Bureau of Investigation tip line received a phone call from an individual who stated that they were acquainted with Jerry P. GORDON (GORDON). This individual said that GORDON had recently expressed to him ways that GORDON would use a .223 caliber rifle to carry out an attack on an individual herein described as J.W.. GORDON further described an abandoned home across the street from J.W.'s residence in which he could set up a "sniper's nest" to carry out the attack.

6. During an interview with the FBI that occurred in December 2024 following this report, GORDON told the FBI that he runs the website reportabusecayuga.com. On this website, GORDON made a blog post in which he posted receipts he made to a non-profit organization. One of these donations was made "In memory of J.W.". During this interview, GORDON stated that he utilizes the email address "J(redacted)n@gmail.com, and the phone number XXX-XXX-0500.

7. On April 24, 2025, an email addressed to numerous government and law enforcement officials was sent from J(redacted)n@gmail.com. Included in this email were the following communications:

Good Morning,
 In the spirit of transparency, please see the email and attached text. I look forward to see a number of you next week. If you do not honor my professional requests to meet at a convenient time for your schedule....then I will simply hunt you down at your homes or other offices.

I am on a tight schedule for this trip and will be looking to complete a trifecta. As stated previously to law enforcement and others, I have very specific targets and am not looking to involve any innocent bystanders. If people leave me alone and let me simply do my job with the intended targets,

then nothing else will happen. If law enforcement or any one else engages with me, then I will act in self-defense and take no responsibility for what happens.

The mission for this trip is to force the hand of New York State and either put [Redacted] in jail or to put me in jail. I will not leave the state until one of those two things happen and if law enforcement engages with me, I will try to take down as many of them as possible with me. I am not playing any more games and you have essentially until midnight tomorrow, Friday, April 25, 2025 to resolve this matter. I have been given permission and authority to go on the offensive starting this Saturday and fully intend to start my vengeance tour and I will accomplish my mission at any cost. I continue laughing at you all for your continued support for these drug dealers and child molesters. I promise you will all be eternally rewarded for your ongoing lack of action....therefore, I will initiate the action for you on my terms and playing by my rules now.

Dear [Redacted]....you have yet to give me an answer on the validity of the marriage certificate so when I show up at your office, you had better have a 'Yes' or 'No' answer for me. I am not waiting months for a simple answer anymore. I will come to your home as well if you fail to meet with me. I have had enough of this nonsense and now I am going to give you all the national attention you are craving so badly.

I will not stop until the adulterous prostitute [Redacted], the "Ghislaine Maxwell of Cayuga County" [Redacted], and the drug dealer [Redacted] is charged and incarcerated.

Have a Great Day!

-Jerry

-----Original Message-----

Good Morning Chief [Redacted]!

Please find attached the texts that I sent to [Redacted]'s supervisor, [Redacted].

Here is [Redacted]'s home address:
[Redacted]

I will be spending the upcoming week meeting with various people, specifically J.W. ([Redacted]), [Redacted] (on campus or at his house), with you [Redacted] on campus or at his house), as well as some of the unethical legal professionals involved. I am very much looking forward to our interaction and it will likely be after I meet with [Redacted].

As I have stated previously, nothing will happen to innocent bystanders or law enforcement as long as they do not engage with me. If anyone engages with me, then I will act in self-defense and will take no responsibility for what happens.

I have tried warning everyone multiple times and still there has been no action so I will be initiating action next week on the Cornell University campus.

I will not stop until the adulterous prostitute [Redacted], the "Ghislaine Maxwell of Cayuga County" [Redacted], and the drug dealer [Redacted] is charged and incarcerated.

Have a Great Day!

-Jerry

8. On April 24, 2025, New York State Police investigators submitted an emergency disclosure to Verizon for cell phone tower data, sms text message detail, subscriber information and location data related to the cellular telephone number XXX-XXX-0500. The subscriber was listed as Jerry GORDON. Included in the sms text message detail received from Verizon, were text messages that were sent to a phone number ending in 4682 that was determined by law enforcement to belong to J.W. who resides in Cayuga County. Three of these messages are included below and were sent on April 23, 2025:

"Has it ever occurred to you that U may actually be in NYS now...or tomorrow....or the day after...or Monday, or next week or the week after? The good think for you is I will ensure you look into my eyes before the final act....that is howe it is most appealing to me...there is something about when the spark leaves the eyes and then they fog out and glaze over and go dark. There is only a short moment that it can be seen. It's beautiful.

"You have just two days left and your life ids going to change forever. Please make good use of these next days and please do you family a favor and take care of necessary paperwork. One of my aunt's just passed and she did not have any arrangements made and now it's falling all in my mother. Please do not do that to your mother. Take care of this stuff today. It's not that complicated and there are plenty of templates online."

"I live approaching guys like you because it hilarious how quickly you dumbasses cower like scared rats when you are about to meet your creator. I personally find it funny and if you see me start laughing as I approach...then you'll know why. I will make it as fun as possible...you have certainly earned it!"

Based on my training and experience, I know that the references to the spark leaving the eyes refers to an individual dying.

9. A review of cell phone records reflect that, at the time the three aforementioned text messages were sent, GORDON was located in Colorado and his cell phone connected to cell phone towers located in Colorado. J.W.'s AT&T records reflect that AT&T cell phone towers located in the Northern District of New York received those electronic transmissions.

10. On April 23, 2025, Jerry GORDON's vehicle was recorded on license plate readers in Colorado. On April 24, 2025, Jerry GORDON'S cell phone location data indicated that he was in Colorado.

11. TSA confirmed that, on April 25, 2025, GORDON boarded flight UA1536 at 7:46 am departing Denver, Colorado, with a connection in Newark and a destination of Syracuse, New York.

12. Location information indicates that GORDON is still utilizing the phone number 607-793-0500. GORDON was observed by law enforcement in the same location as his cell phone in the Newark, NJ airport on April 25, 2025. GORDON was not accompanied by anyone during his trip. Based on my training and experience, this is an indication that GORDON is the primary user of the phone number XXX-XXX-0500.

13. Based on the information described above, there is probable cause for the Court to authorize a criminal complaint charging GORDON with violating 18 U.S.C. § 875(c).

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.



John J. Honan
Special Agent

I, the Honorable Mitchell J. Katz, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on April 25, 2025 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Hon. Mitchell J. Katz
United States Magistrate Judge